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6
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OLD REPUBLIC NATIONAL TITLE INSURANCE
COMPANY
8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11
12 DEUTSCHE BANK NATIONAL TRUST
13 COMPANY, AS INDENTURE TRUSTEE
14 UNDER THE INDENTURE RELATING TO
IMH ASSETS CORP., COLLATERALIZED
ASSET-BACKED BONDS, SERIES 2005-7,

15 Plaintiff,

16 vs.

17 OLD REPUBLIC TITLE INSURANCE
18 GROUP, INC., et al.,

19 Defendants.
20

21 Case No.: 2:20-cv-02009-GMN-DJA
22

23 **STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO DEUTSCHE BANK'S
OPPOSITION TO OLD REPUBLIC
NATIONAL TITLE INSURANCE
COMPANY'S MOTION TO DISMISS
[ECF No. 30]**

24 **(First Request)**

1 COMES NOW Defendant Old Republic National Title Insurance Company (“Old
 2 Republic”) and Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee Under the
 3 Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-7
 4 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby
 5 stipulate and agree as follows:

- 6 1. On December 10, 2020, Old Republic filed a Motion to Dismiss [ECF No. 15];
- 7 2. On March 18, 2021, Deutsche Bank filed its response in opposition to Old Republic’s
 motion to dismiss [ECF No. 30];
- 8 3. Old Republic’s deadline to file its reply memorandum responsive to Deutsche Bank’s
 opposition to Old Republic’s motion to dismiss is currently March 25, 2021;
- 9 4. Old Republic’s counsel is requesting a brief extension of time to file the
 aforementioned reply memorandum, through and including April 8, 2021, to afford
 Old Republic’s counsel additional time to review, analyze, and respond to the legal
 arguments set forth in Deutsche Bank’s brief;
- 10 5. Deutsche Bank does not oppose the requested extension;
- 11 6. This is the first request for an extension which is made in good faith and not for
 purposes of delay;

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25 STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO OPPOSITION TO MOTION TO
 26 DISMISS

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 28 604846.1

1 **IT IS SO STIPULATED** that Old Republic's deadline to respond to Deutsche Bank's
2 opposition to Old Republic's motion to dismiss [ECF No. 30] is hereby extended through and
3 including April 8, 2021.

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5 Dated: March 23, 2021

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7 EARLY SULLIVAN WRIGHT
8 GIZER & MCRAE LLP

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10 By: /s/-- Sophia S. Lau
11 SCOTT E. GIZER
12 SOPHIA S. LAU
13 Attorneys for Defendant OLD REPUBLIC
14 NATIONAL TITLE INSURANC COMPANY

15

16 Dated: March 23, 2021

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18 WRIGHT FINLAY & ZAK, LLP

19

20 By: /s/-Lindsay D. Robbins
21 DARREN T. BRENNER
22 LINDSAY D. ROBBINS
23 Attorneys for Plaintiff DEUTSCHE BANK
24 NATIONAL TRUST COMPANY

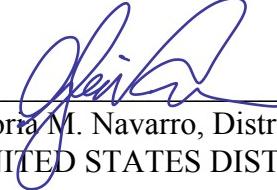
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26 **IT IS SO ORDERED.**

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28 Dated this 23 day of March, 2021

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30 
31 Gloria M. Navarro, District Judge
32 UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP